

**IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

GEOTAG INC.,

Plaintiff,

v.

AROMATIQUE, INC.; *et al.*,

Defendants.

2:10-cv-00570

GEOTAG, INC.,

Plaintiff,

v.

YAKIRA, L.L.C.; *et al.*,

Defendants.

2:10-cv-00587

**OPPOSED MOTION TO WITHDRAW
AS COUNSEL OF NI LAW FIRM, PLLC**

Hao Ni, Stevenson Moore and the Ni Law Firm, PLLC (“Ni Law Firm”) file this Opposed¹ Motion to Withdraw as Counsel and respectfully request that Messers. Ni, and Moore, and the Ni Law Firm be permitted to withdraw as counsel of record for GeoTag, Inc. (“GeoTag”).

GeoTag has terminated the services of the Ni Law Firm, and the Ni Law Firm no longer has authority to represent GeoTag in any matters related to this litigation.

¹ A brief summary of the reasons for Defendants’ opposition to the relief requested herein is specified in the Certificate of Conference below. Defendants will file responses to this opposed Motion pursuant to Local Rule CV-7.

Dated: August 29, 2012

Respectfully submitted,

NI LAW FIRM, PLLC

By /s/ Hao Ni

Hao Ni

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the above and foregoing document has been served on August 29, 2012, to all counsel of record who are deemed to have consented to electronic service vi the Court's CM/ECF system per Local Rule CV-5(a)(3).

/s/ Hao Ni

Hao Ni

CERTIFICATE OF CONFERENCE

The undersigned hereby certifies that counsel has complied with the meet and confer requirement of Local Rule CV-7(h) and that the motion is opposed. Counsel for Buether Joe & Carpenter, LLC, The Ni Law Firm PLLC, and the Law Offices of Young Pickett conferred with representatives of Defendants and discussed the issues presented herein by teleconference and e-mail on August 28, 2012. Plaintiff's counsel stated that they had been terminated by GeoTag on August 27th. Defendants indicated that opposition to the relief sought herein was necessary, as the withdrawal of Buether Joe & Carpenter, LLC, The Ni Law Firm PLLC, and the Law Offices of Young Pickett would leave Plaintiff GeoTag, Inc. without counsel, which is not permitted (*see Rowland v. Cal. Men's Colony*, 506 U.S. 194, 201-02 (1993); *see also Purple Leaf, LLC v. EBay, Inc.*, Case No. 6:11-cv-360, Dkt. No. 15 (E.D. Tex. Oct. 17, 2011) (Davis, J.)). Thus, new counsel for GeoTag should enter an appearance before the withdrawal of current counsel is effectuated. Defendants may request additional relief in their response(s) to this opposed Motion filed pursuant to Local Rule CV-7, including but not limited to dismissal of GeoTag's claims if substitute counsel does not enter an appearance in these cases on GeoTag's behalf within a reasonable amount of time.

Based on the foregoing, undersigned hereby certifies that counsel has complied with the meet and confer requirement of Local Rule CV-7 and that an open issue exists for the Court to resolve.

/s/ Hao Ni

Hao Ni